



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 21 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7669 2175**  
**RETURN RECEIPT REQUESTED**

Dave Kemper  
Process Engineering Manager  
Multicircuits Inc.  
2301 Universal Street  
Oshkosh, Wisconsin 54904

Re: Notice of Violation  
RCRA Compliance Evaluation Inspection  
Multicircuits Inc.  
EPA I.D. No.: WID988580072

Dear Mr. Kemper:

On February, 12, 2013, a representative of the U.S. Environmental Protection Agency Region 5 and Wisconsin Department of Natural Resources inspected Multicircuits Inc. (Multicircuits), located at 2301 Universal Street in Oshkosh, Wisconsin. The purpose of the inspection was to evaluate Multicircuits' compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment, and storage of hazardous waste by a large quantity generator of such wastes. We have enclosed a copy of the EPA inspection report and checklists for your reference.

Based on information provided by Multicircuits personnel, a review of records and personal observations by inspectors, EPA finds that Multicircuits is engaged in the management of hazardous waste and is in violation of certain requirements of the United States Code of Federal Regulations (C.F.R.) and the Wisconsin Administrative Code (WAC). To be eligible for the exemption from the requirement to obtain a hazardous waste license, Multicircuits must be in compliance with the conditions of WAC NR §662.034(1)-(3) [40 C.F.R. § 262.34]. Specifically, we find that Multicircuits is in noncompliance with the following conditions for a storage license exception, and is in violation of the following requirements:

1. A person who generates a solid waste must determine if that waste is a hazardous waste. See, WAC NR § 662.011 [40 C.F.R. § 262.11]. According to WAC NR § 662.040 [40 C.F.R. § 262.40 (C)], a generator must keep records of any test results, waste analyses, or other determination for at least three years from the date that the waste was last sent to an on-site or off-site treatment, storage, or disposal facility.



During the inspection of the Laboratory Area, the inspector observed a 5 gallon container marked "waste." The facility representative stated that the "waste" is considered to be nonhazardous based on generator knowledge. Supporting documentation for the nonhazardous waste was not provided to the inspector. In using generator knowledge, a determination must be documented especially when the determination of the waste is not hazardous. Multicircuits, therefore, violated the above-referenced generator requirements.

2. A generator who transports, or offers for transport a hazardous waste for off-site treatment, storage, or disposal, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A, according to the instructions included in the appendix to 40 C.F.R. part 262. See, WAC NR § 662.020(1) [40 C.F.R. § 262.20].

The review of manifest records, specifically manifest tracking numbers 006943762JJK and 006943768JJK, showed the generator had signed in a field designated for Transporter 2. Multicircuits, therefore, violated the above-referenced generator requirements. However, Multicircuits submitted a corrected manifest on April 8, 2013. Thus, no further actions are necessary to comply with this requirement.

3. A generator shall, for shipments of hazardous waste outside of Wisconsin, submit a copy of each manifest to the Department within 30 days of receiving the signed copy from the designated facility. See WAC NR §662.023(3) [40 C.F.R. § 262.23(3)].

During review of records, the inspector noted several instances where copies of manifests were not forwarded to the WDNR. The WDNR Manifest Records for Selected Generator Shipped Between 02/01/2010 and 02/01/2013 Report showed the following missing manifests: (1) 000318885WAS; (2) 000476401JJK; (3) 000391148WAS; (4) 006943762JJK; (5) 006943768JJK; (6) 000413938WAS; (7) 000448433WAS; and (8) 000494749WAS. Multicircuits, therefore, violated the above-referenced generator requirements. However, Multicircuits forwarded the missing manifest to WDNR on April 8, 2013. Thus, no further actions are necessary to comply with this requirement.

4. A generator of hazardous waste must determine if the waste has to be treated before it can be land disposed. This is done by determining if the hazardous waste meets the treatment standards in rule WAC, NR § 668.40, 668.45, or 668.49 of the Administrative Code. This determination can be made either by testing the waste, or by using knowledge of the waste. Also, if the waste or contaminated soil does not meet the applicable treatment standard, then, the generator shall send a one-time written notice to each treatment or storage facility receiving the waste with the initial waste shipment, and shall place a copy in the generator's file. See, WAC NR §668.07(1) (a) and (b) [40 CFR § 268.7(a)(1)-(2) and (4)].

Also, a generator must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this section for at least three years from the date that the waste that is the subject of such documentation was last sent to an

on-site or off-site treatment, storage, or disposal facility. See, WAC NR § 668.07(1)(h) [40 CFR § 268.7(a)(8)].

Multicircuits could not produce the notifications that must be sent to the receiving facility that would indicate if the waste identified in manifest tracking number 001548720GBF, 001687007GBF, and 00494749WAS met the land disposal treatment standards. Multicircuits, therefore, violated the above-referenced land disposal treatment determination recordkeeping requirement.

5. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must list in its contingency plans names, addresses, and phone numbers (office and home) of all persons qualified to act as an emergency coordinator ( see § 265.55) and this list must be kept up to date. Where more than one person is listed, one must be named as the primary emergency coordinator and the others must be listed in the order in which they will assume responsibility as alternates. See, WAC NR §662.034(1)(d) [40 C.F.R. § 262.34(a)(4)]; WAC, NR §665.0052(4) [40 C.F.R. § 265.52(e)]. These are also requirements applicable to owners and operators of hazardous storage facilities under WAC NR §664.0052(4)[40 C.F.R. § 264.52(e)].

In order to avoid the need for a hazardous waste storage permit, a large quantity generator must ensure its contingency plan is reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes. See, WAC NR §662.034(1)(d) [40 C.F.R. § 262.34(a)(4)]; WAC, NR §665.0052(4) [40 C.F.R. § 265.52(e)]. These are also requirements applicable to owners and operators of hazardous storage facilities under WAC NR §664.0052(4)[40 C.F.R. § 264.52(e)].

During the review of the Contingency Plan at the time of the inspection, the names, addresses, and phone numbers (office and home) of all persons qualified to act as an emergency coordinator were not provided. Multicircuits, therefore, failed to comply with the above-referenced condition for a license exemption and violated the above-referenced contingency plan requirements. However, Multicircuits submitted documentation on May 3, 2013 showing amendments to the Contingency Plan. Thus, no further actions are necessary to comply with the above-referenced condition/requirement.

6. In order to accumulate hazardous waste on-site for 90 days or less without an operating permit or interim license, a generator must mark each container to identify its contents and must ensure that the date upon which each period of accumulation begins shall be clearly marked and visible for the inspection on each container. See, WAC NR §662.034(1)(b) [40 C.F.R. § 262.34(a)(2)].

During the inspection of the 90 day accumulation area, the inspector observed four 55 gallon drums marked with two accumulation start dates. The marking of two dates on each of the four drums did not clearly identify the date upon which the accumulation began. Multicircuits, therefore, failed to comply with the above-referenced condition for a license exemption and violated the above-referenced storage container management requirement. However, Multicircuits, submitted documentation on April 8, 2013



showing corrections made to container management at the facility. Thus, no further actions are necessary to comply with the above-referenced condition.

7. A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in s. NR 661.33 (5) in containers at or near any point of generation where waste initially accumulate, which is under the control of the operator of the process generating the waste, without an operating license or interim license and without complying with sub. (1) provided the generator complies with NR 665.0171, 665.0172 and 665.0173(1) –specifically, a container holding hazardous waste shall always be closed during storage except when it is necessary to add or remove waste, and provided the generator marks the containers either with the words “Hazardous Waste” or with the words that identify the contents of the container. See, WAC NR. §662.034(3) (a)(1) and 2 [40 C.F.R. § 262.34(c)(1)(ii) ].

During the inspection of the satellite accumulation areas, the inspector observed four open four 55 gallon drums. Hazardous waste was not added or removed at the time of the inspection. Multicircuits, therefore, failed to comply with the above-referenced conditions for a license exemption. Facility personnel provided lids to close the 55 gallon drums and provided documentation of the closed drums on April 8, 2013. Thus, no further actions are necessary to comply with the satellite container management condition.

8. A small quantity handler of universal waste must label and mark clearly containers in which the batteries are contained with “Universal Waste –Battery (ies),” or “ Waste Battery (ies),” or “Used Battery(ies).” See, WAC NR §665.0037(1)(a) and (c) [40 C.F.R. § 273.14(a)].

During the inspection of the Universal Waste Accumulation Area, the inspector observed batteries stored in a container that was not properly labeled and marked as universal waste. Multicircuits, therefore, violated the above-referenced universal waste requirements. However, Multicircuits, submitted documentation on April 8, 2013 showing the proper labeling and marking of the container storing the batteries. Thus, no further actions are necessary to comply with the above-reference condition/requirement.

9. A small quantity handler of universal waste must label and mark clearly containers in which the lamps are contained with “Universal Waste –Lamp (s),” or “ Waste Lamp (s),” or “Used Lamp(s).” See, WAC NR §665.0037(1)(a) and (c) [40 C.F.R. § 273.14(e)].

During the inspection of the Universal Waste Accumulation Area, the inspector observed lamps stored in a container that was not properly labeled and marked as universal waste. Multicircuits, therefore, violated the above-referenced universal waste requirements. However, Multicircuits, submitted documentation on April 8, 2013 showing the proper labeling and marking of the container storing the lamps. Thus, no further actions are necessary to comply with the above-reference condition/requirement.

10. A large quantity generator who accumulates hazardous waste on-site for less than 90 days, and who does not meet the conditions for a storage license exception set forth in WAC NR §662.034(1)-(3) [40 C.F.R. § 262.34], is an operator of a hazardous waste storage facility, is subject to storage facility requirements, and is required to apply for and obtain a hazardous waste storage license. See, WAC NR Part 664, WAC NR §§ 670.001, 670.010, and 670.013 [40 C.F.R. Part 264, 40 C.F.R § 270.1(c), 270.10(a) –(d), 270.13]. On failing to comply with the conditions for a permit exception referenced in items 5-7 above, Multicircuits became an operator of a hazardous waste storage facility, and was required to apply for and to obtain, a hazardous waste storage permit. Multicircuits' failure to apply for and to obtain a hazardous waste storage license violated the above-referenced licensing requirements.

At this time, EPA is not requiring Multicircuits to apply for a storage license, so long as it immediately establishes compliance with the conditions for an exemption as outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements.

You should submit your response to Cindy Dabner, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions or concerns regarding this letter, please contact Cindy Dabner, of my staff, at 312-886-5890.

Sincerely,



GJ/ Gary J. Victorine, Chief  
RCRA Branch

cc: Barti Oumarou, WDNR – NER Oshkosh Service Center  
[barti.oumarou@wisconsin.gov](mailto:barti.oumarou@wisconsin.gov)

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5, LCD, RCRA BRANCH, LR8J  
77 WEST JACKSON BLVD  
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: MULTICIRCUITS

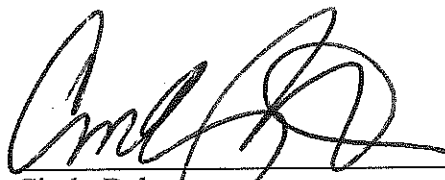
EPA ID NUMBER: WID988580072

ADDRESS: 2301 Universal Street, Oshkosh, WI 54804

DATE OF INSPECTION: February 12, 2013

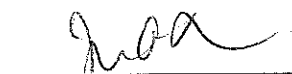
EPA INSPECTOR: Cindy Dabner  
Environmental Scientist

PREPARED BY:

  
Cindy Dabner  
Compliance Section 2

2/20/14  
Date

ACCEPTED BY:

  
Julie Morris, Chief,  
Compliance Section 2

2/26/14  
Date

### **Purpose of the Inspection**

This inspection was an evaluation of Multicircuit's compliance with hazardous waste regulations found at Wisconsin Administrative Code Chapter Nature Resources (WAS NR) 660 through 679 and Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection with Inspector Barti Oumarou of the Wisconsin Department of Natural Resources. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation (CEI). The site notified as a large quantity generator (LQG).

### **Participants**

U.S. Environmental Protection Agency (U.S. EPA Inspector  
Cindy Dabner, U.S. EPA Region 5

State of Wisconsin Department of Natural Resources Inspector  
Barti Oumarou, (WDNR)

Representatives of Multicircuits -

Dave Kemper, Process Engineering Manager, Multicircuits

Michal Thiel, Director of Operations, Multicircuits

### **Introduction**

On February 12, 2013, Inspectors Oumarou and Dabner arrived to the site at approximately 9:50 a.m. After checking in at the front office, the inspectors were directed to Mr. Dave Kemper, the Process Engineering Manager and Mr. Michael Thiel, the Director of Operations. Inspector Dabner presented her federal identification and Inspector Oumarou presented his state identification. After explaining the purpose and process the inspection would be conducted, Mr. Thiel requested the Inspectors complete a Visitor Authorization Application (ITAR) and provide a copy of their identification cards. Inspector Dabner asked the purpose of the ITAR application. Mr. Thiel explained the application is used to certify a U.S. citizen as defined by 22 CFR 120.15, 8 USC 1101(a)(20), and 8 USC 1324b(a)(3). Mr. Thiel stated that this procedure of attesting U.S. citizenship will become common practice when Inspectors conduct inspections at various facilities throughout the Oshkosh area. Inspector Dabner agreed to complete the ITAR form attesting that she is a U.S. citizen. However, she informed Mr. Thiel that EPA Policy prevents inspectors from allowing the copying of federal identification.

Mr. Thiel then requested the inspectors provide him their state identification to copy. For safety reasons, it was decided not to provide copies of state identification cards. Once the identification procedures were addressed, Mr. Kemper provided the two inspectors a general overview of the copper plating operations conducted at the facility.

During the opening conference, Inspector Dabner inquired about the required safety measures to conduct during the inspection tour. She also discussed Confidential Business Information (CBI)

and the use of a camera during the inspection. Multicircuits did not make any CBI claims on: (1) the information provided to the inspectors; or (2) photographs taken during the inspection. Mr. Kemper required the Inspectors to wear a hard hat, safety glasses, and steeled toe shoes. Inspector Dabner provided a Small Business Resources information Sheet and Pollution Prevention Brochure to Mr. Kemper.

### **Site Description**

At the time of the inspection, Multicircuits was considered to be a small business located at 2301 Universal Street, Oshkosh, Wisconsin. According to information provided, the facility has been located at this location since 1990. Multicircuits employs approximately 68 employees and operates 24 hours a day, 5 days a week. The facility has nearly 24, 000 square feet of manufacturing space.

Multicircuits uses copper plating processing to manufacture single-sided, double-sided, and multi-layered printed circuit boards. The circuit boards produced by Multicircuits are used to provide a wide range of applications for medical and avionic industries. Bare materials are processed through four major processing lines: (1) copper electroplating line; (2) copper electroless; (3) electroless nickel immersion Gold (ENIG); and (4) final finishing. The four processing lines are commingled and routed through the pretreatment system which is composed of four tanks with secondary containment and a 10x10x9 underground pit. Tank#1 is used for pH adjustment. Tank#2 is a coagulant tank. Tank#3 is the polymer and clarifier tank and Tank#4 contains rinse water from the developer and filter press.

At the time of the inspection, Multicircuits was operating under a wastewater discharge permit through the WDNR. The pretreatment system generates waste that is coded as a listed F006 waste water treatment sludge. According to Mr. Kemper, F006 waste plating sludge from wastewater is recycled by Agmet Metals located in Ohio.

The main waste streams generated at Multicircuits consist of the following: (1) waste plating sludge from wastewater (F006); (2) spent nitric acid (D002); (3) spent gold cyanide (F007); (4) glycol ether (D001); and (5) hazardous silver (D011). Hazardous waste is accumulated in 55-gallon drums. The facility also generates universal waste. Fluorescent lamps are recycled by Lamp Recyclers Inc.

### **Site Tour**

Mr. Kemper escorted Inspector Oumarou and Inspector Dabner during the site inspection tour. The tour started in the Drill Room. Hazardous waste was not observed stored in the Drill Room. The inspection proceeded to the Printing Room. Mr. Kemper explained that waste generated from the printing plotter is sent to the wastewater treatment unit. After touring the Printing Room, the inspection continued to the Laboratory Area. At the Laboratory Area, Inspector Dabner observed a 5-gallon container labeled "Waste." A picture was taken of the 5-gallon

container. See Photograph# 2. Mr. Kemper stated that the waste that was stored in the 5-gallon container was determined to be non-hazardous based on process knowledge. No hazardous waste determination documentation was provided at the time of the inspection. The Inspectors were then escorted to the Electroless Plating Area. At the Electroless Plating Area, Inspector Dabner observed two unmarked 55-gallon plastic drums. Pictures were taken of the unmarked 55-gallon drums. See Photographs#3 and #4. The facility representative informed the inspectors that the substance contained in the two 55-gallon drums were determined to be non-hazardous based on process knowledge. After inspecting the Electroless Plating Area, the inspection moved to the Electrolyte Tin Processing Area. Inspector Dabner observed one unmarked and unlabeled 55-gallon drum. Pictures were taken of the unmarked and unlabeled 55-gallon drum. See Photographs#5 and #6. Mr. Kemper explained the unmarked drum contained spent solder dross from the Soldering Process. He also informed the Inspectors that the spent dross generated from print circuit board manufacturing is considered to be by-product and is reclaimed and not managed as hazardous waste.

Further along in the tour, Inspector Dabner observed several opened plastic 55-gallon drums marked as hazardous waste at the Solder Mask Satellite Accumulation Area. The first 55-gallon drum was marked Gylco Ether, Waste Code D001. Pictures were taken of the opened 55-gallon drum. See Photographs#7 through 9. A cover was placed on the drum during the time of the inspection. The second 55-gallon plastic drum was observed opened with a filter inserted in the drum. This white 55-gallon drum was marked as hazardous waste to be treated, Multi-Bond Ballout. A picture was taken of the opened 55-gallon drum. See Photographs#10 through 14. During the inspection, the filter was removed and replaced with a cap to close the drum.

At another Solder Mask Satellite Accumulation Area, Inspector Dabner observed an uncovered 55-gallon drum marked as Waste Flammable Liquid D001, Glycol Ether. Pictures were taken of the uncovered 55-gallon drum. See Photographs #15-19. During the inspection, the filter was removed and replaced with a cap to close the drum.

The inspection moved to the 90-Day Accumulation Area. Four drums were stored at the 90-Day Accumulation Area. Mr. Kemper informed Inspector Dabner that waste is stored at this location prior to going to the wastewater treatment system. Four 55-gallon drums were observed to have two dates. Drum#1 was marked 5 Percent Acid and was dated 2/8. Drum#1 was also dated 12/5/12. Drum#2 was marked 5 Percent Acid and dated 2/8. Drum#2 was also dated 8/3/12. Drum#3 was marked Multi-Bond Ballout and was dated 2/11/13. Drum#3 was also dated 12/5/12. Drum#4 was marked 10 Percent Acid and dated 2/8. Drum#4 was also dated 12/5/12. Pictures were taken to show the two dates on the drums. See Photograph#20 through 28.

After observing the 90-Day Accumulation Area, the inspection proceeded to the Wastewater Treatment Area. The wastewater treatment unit container was labeled as F006 hazardous waste. Inspector Dabner did not observe any F006 hazardous waste in the wastewater treatment unit container. A picture was taken of the marked 55-gallon drum container with no waste. See

Photographs# 29-31. Inspector Dabner did not observe a lid for the hazardous waste container during the inspection.

Inspectors observed an uncovered 25-gallon container storing blue substance (Riston). According to Mr. Kemper, the blue substance is considered to be non-hazardous photo resistance dry fill based on process knowledge. No documentation support the nonhazardous waste determination was provided at the time of the inspection. A picture was taken of the 25-gallon container. See Photograph#32.

The inspectors toured the Universal Waste Accumulation Area. A picture was taken of the Universal Waste Accumulation Area. See Photographs#33-34. Inspector Dabner observed universal waste containers not labeled and marked with the specific waste stored in the containers. The inspectors could not determine the accumulation dates for lamps and batteries stored in the universal waste area.

During the inspection, the Inspectors observed fire extinguishers, spill control equipment, internal communications systems, and alarm systems.

#### **Record Review**

A records review was conducted following the facility tour. The inspectors requested to review hazardous waste determination documents, hazardous waste manifest, land disposal restriction (LDR) forms, universal waste documents, personnel training documents, weekly inspection logs, and personnel training records for the past three years. Both the Inspector Oumarou and Inspector Dabner reviewed hazardous waste manifest, land disposal restriction records, universal waste shipping records, and material data sheets during the inspection. The generator status was considered to be a large quantity generator based on the amount of hazardous waste generated within one month.

The Inspectors noted some discrepancies with the Hazardous Waste Manifest:

<b>Manifest Tracking Number</b>	<b>Discrepancy</b>
006943762JJK	Generator signed in the Transporter 2 Field
006943768JJK	Generator signed in the Transporter 2 Field
000318885WAS	Manifest not forwarded to WDNR according to WDNR Report 02/01/2010 thru 02/01/13; Designated Facility: Sims Recycling Solutions-Refining Franklin, IL
000476401JJK	Manifest not forwarded to WDNR; Designated Facility: Envirite, Henry, IL
000391148WAS	Manifest not forwarded to WDNR; Designated Facility: Sims Recycling Solutions-Refining Franklin, IL
006943762JJK	Manifest not forwarded to WDNR; Designated Facility: Agmet LLC Maple, OH
006943768JJK	Manifest not forwarded to WDNR; Designated Facility: Agmet LLC Maple, OH



000413938WAS	Manifest not forwarded to WDNR; Designated Facility: Sims Group Franklin Park, IL
000448433WAS	Manifest not forwarded to WDNR; Designated Facility: Sims Group Franklin Park, IL
000494749WAS	Manifest not forwarded to WDNR; Designated Facility: Sims Group Franklin Park, IL

**Land Disposal Restriction Review:**

Manifest Tracking #	LDR
001548720GBF	Not available
001687007GBF	Not available
000494749WAS	Not available

Plan and Emergency Procedures did not include the designation of the primary emergency coordinator, alternate emergency coordinators, or the name, address, and phone number for each emergency coordinator. Fires and spills related to hazardous waste were not reported to the Inspectors during the inspection.

**Closing Conference**

A closing conference was conducted with Mr. Kemper. Inspectors Oumarou and Dabner summarized the areas of concern noted during the inspection. Inspector Dabner explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility representative after conducting an inspection. The inspection concluded at approximately 5:00 p.m.

**Post-Inspection**

Prior to completion of this inspection report, Mr. Kemper provided Inspector Dabner supplemental information. Supplemental information is provided in Attachment F- Multicircuits Post-Inspection Document Log.

**Attachments**

- A. Multicircuits Inspection Photographs
- B. Multicircuits Photograph Log
- C. WDNR Large Quantity Generator Inspection Checklist
- D. WDNR Universal Waste Handler Inspection Report-Small Quantity Handler
- E. Multicircuits Document Log
- F. Multicircuits Post-Inspection Document Log

# ATTACHMENT A

Multicircuits Inspection Photographs

WID988580072



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #1

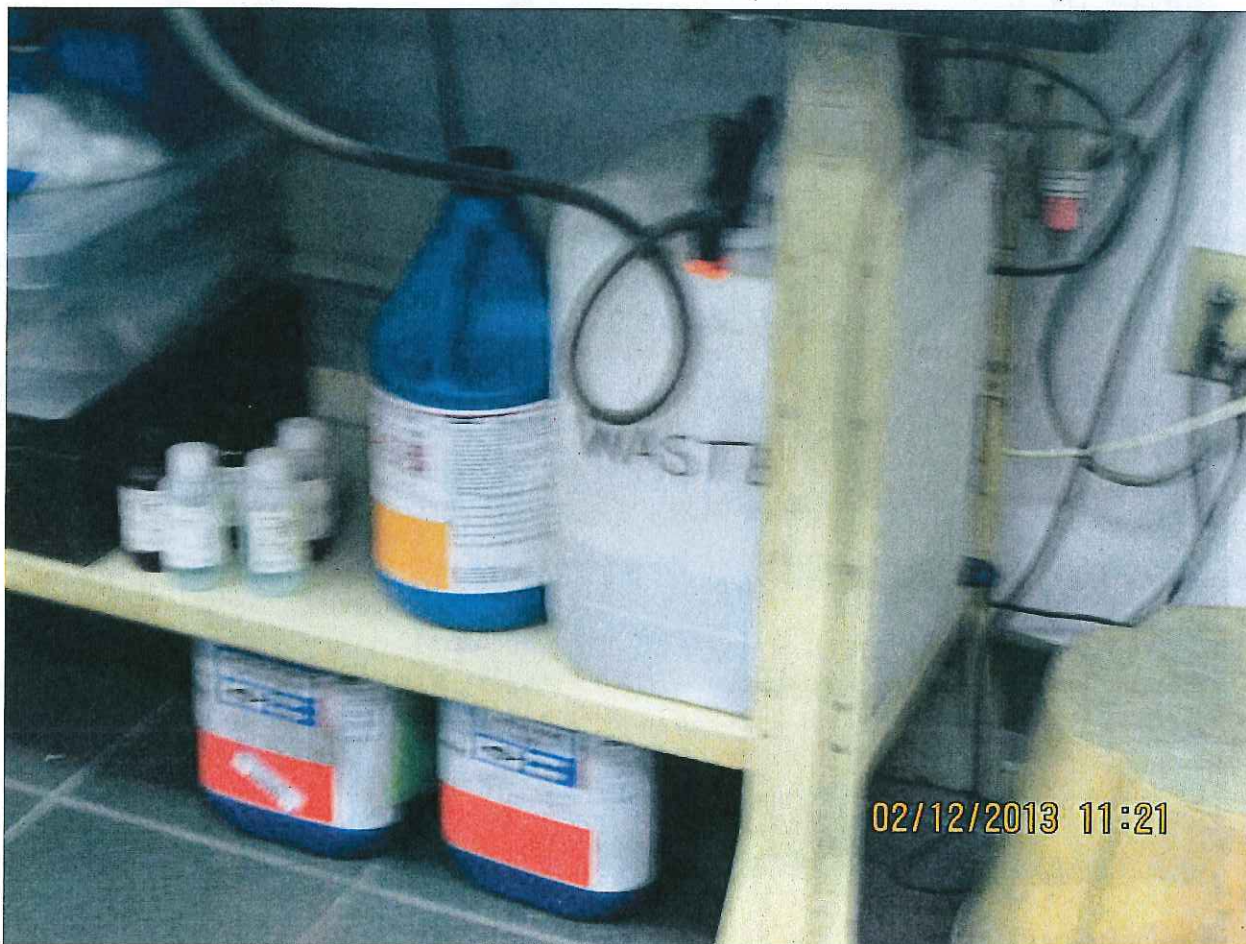
Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Photograph of the facility sign

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: # 2

Name of Photographer: Cindy Dabner

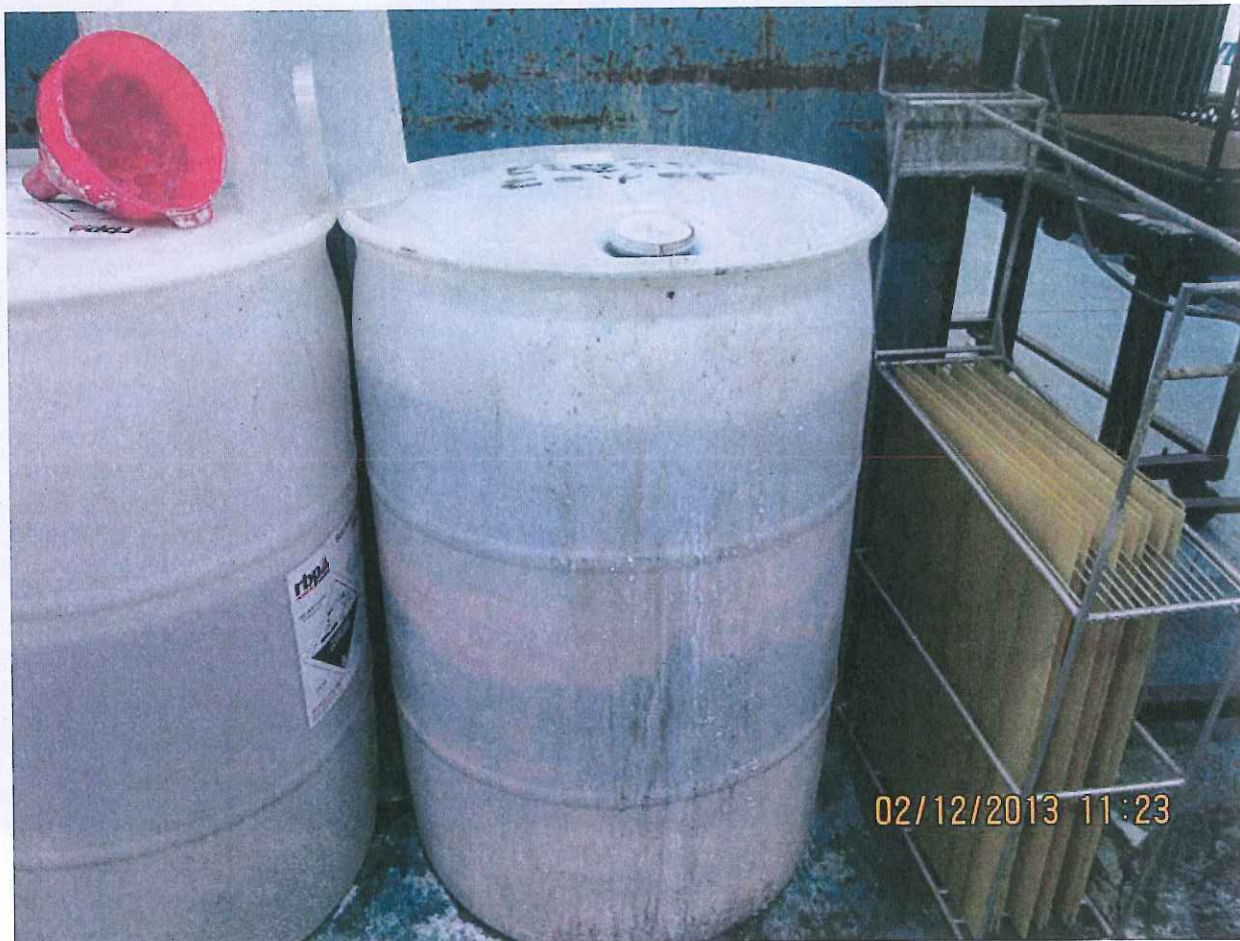
Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: 5 gallon container located in the Laboratory Area marked as "waste"



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #3

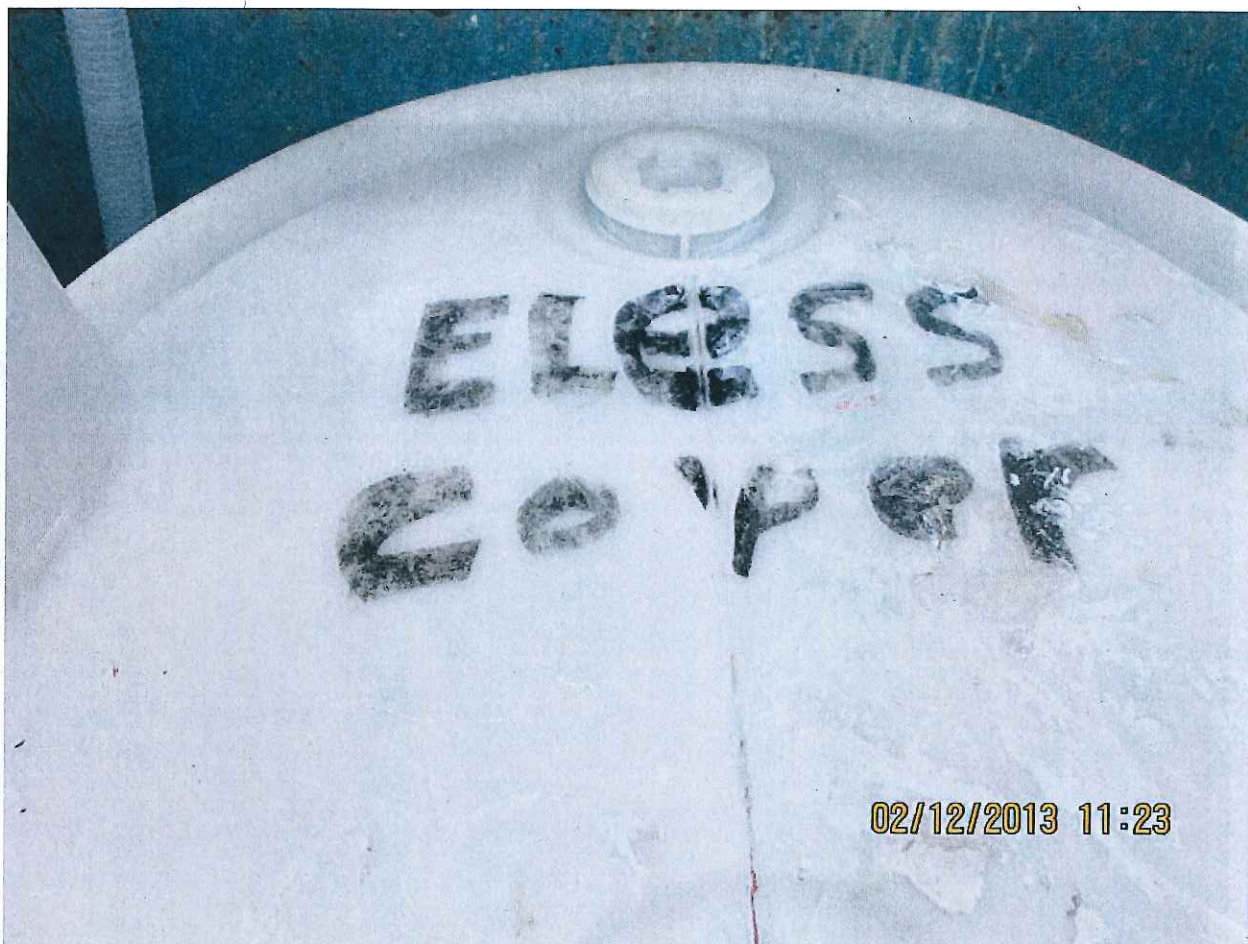
Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Two unmarked plastic 55 gallon drums located in the wet area of the Electroless Plating Area

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #4

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A picture capturing the top of one of the plastic 55 gallon drums identified in Photo#3



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph# 5

Name of Photographer: Cindy Dabner

Date/Time of Photograph:

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open and unmarked 55 gallon drum containing spent solder dross located in the Electrolyte Tin Processing Area

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: 6#

Name of Photographer: Cindy Dabner

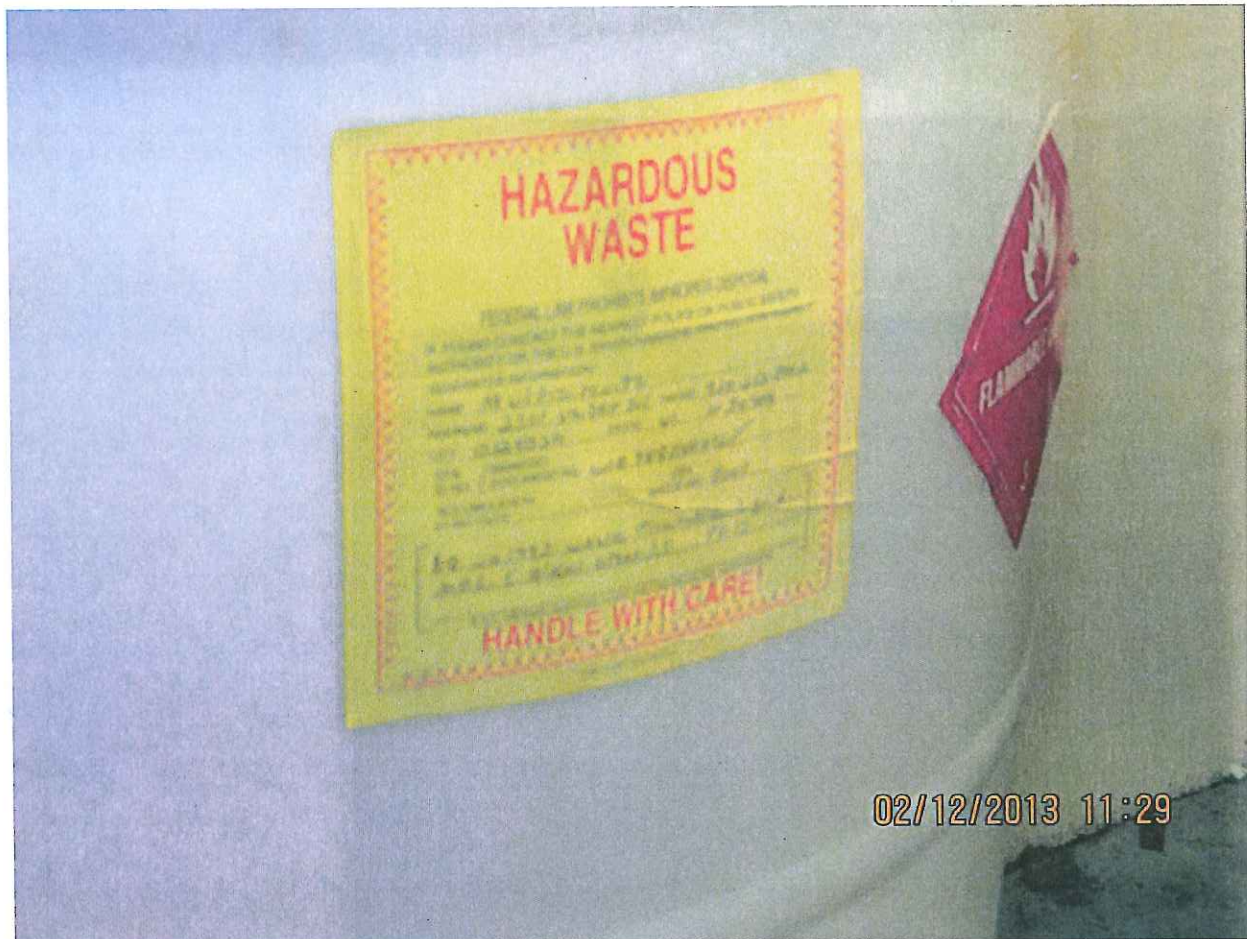
Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Unmarked 55 gallon drum identified in Photo#5



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #7

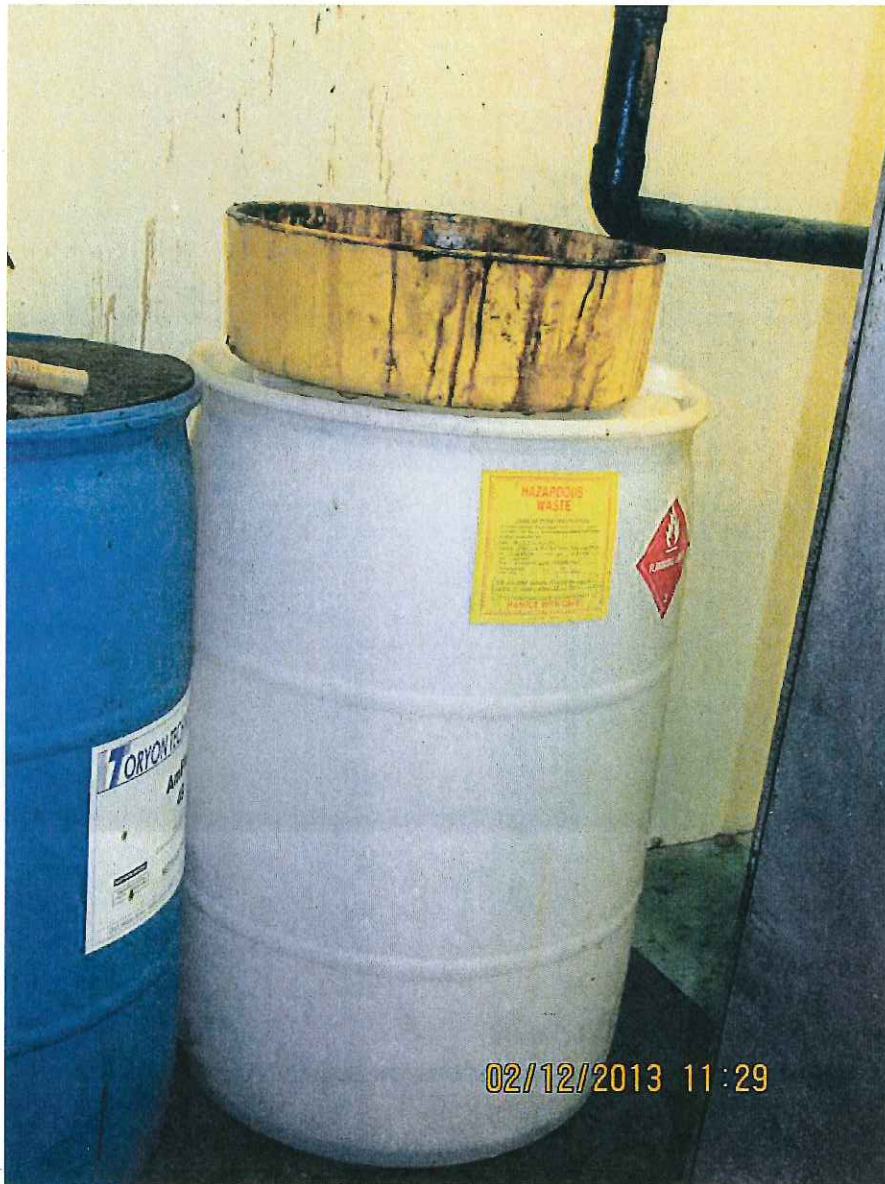
Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open plastic 55 gallon drum containing hazardous waste located at a satellite accumulation area

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #8  
Name of Photographer: Cindy Dabner  
Date/Time of Photograph: February 12, 2013  
Site Location: 2301 Universal Street, Oshkosh, WI 54804  
Description: Open plastic 55 gallon drum containing hazardous waste identified in Photo#7



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #9

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open plastic 55 gallon drum containing hazardous waste located at a satellite accumulation area



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**

**Multicircuits** **HAZARDOUS WASTE TAG**

ID Number: \_\_\_\_\_

<b>DO NOT USE FOR PRODUCTION</b>	
Hazardous Waste to be treated	
Chemical	MULTIBOND 8411011
Operator	BTL
Date In:	STARTED 2-11-13
For Treatment Use only!	
Treat Operator	
Date Treated:	

DOCUMENTS/FORMS/ SF1.0168  
REVISION: 1  
DATE: MAY 27, 2008  
SF 1.0168

**02/12/2013 11:48**

Photograph: #10

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open plastic 55 gallon drum located at a satellite accumulation area identified in Photo#11

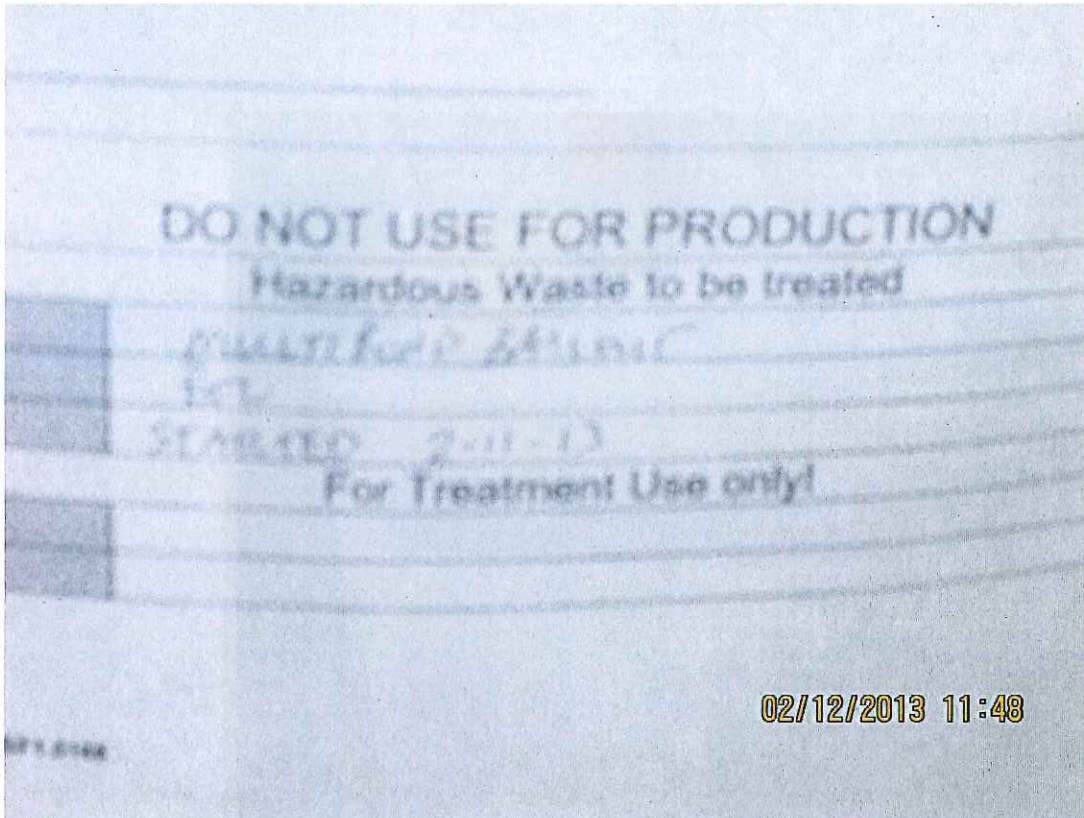
**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: 11#  
Name of Photographer: Cindy Dabner  
Date/Time of Photograph: February 12, 2013  
Site Location: 2301 Universal Street, Oshkosh, WI 54804  
Description: Open plastic 55 gallon drum located in a satellite accumulation area



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #12

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open plastic 55 gallon drum located in a satellite accumulation area identified in Photo#11

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #13

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open plastic 55 gallon with filter located in a satellite accumulation area



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**

**Material for Use/Reuse**  
per 40 CFR 261.2(e)

Generator Information:

Name: \_\_\_\_\_  
Address: \_\_\_\_\_ Phone: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

FL Corrosive Liquid, Basic, Inorganic, N.O.S., 8.  
UN3291, PGII. (Ammonium Hydroxide, Copper  
Chloride Solution), Marine Pollutant, ERG 154

02/12/2013 12:02

Photograph: #14

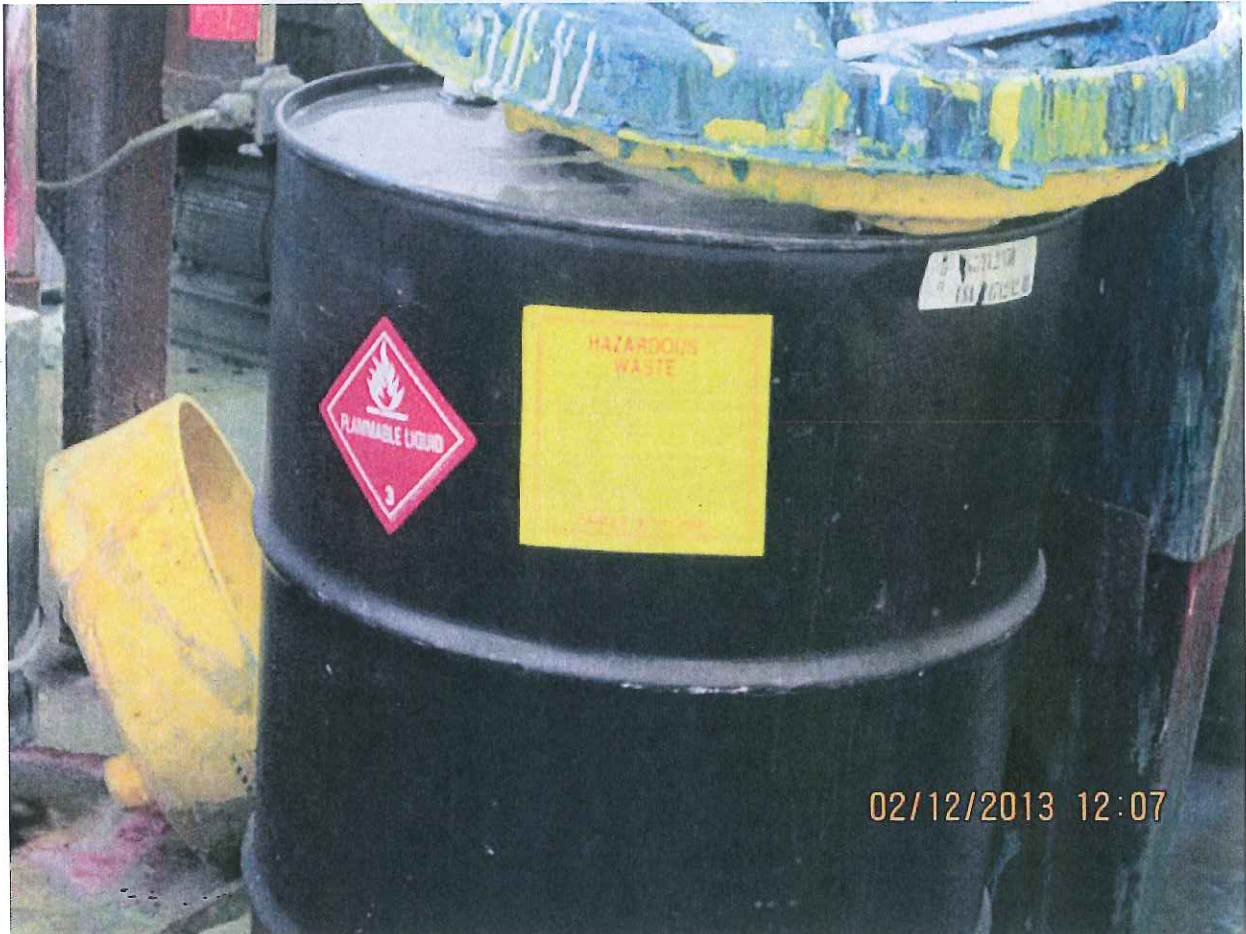
Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Container marked as material for use/reuse

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #15

Name of Photographer: Cindy Dabner

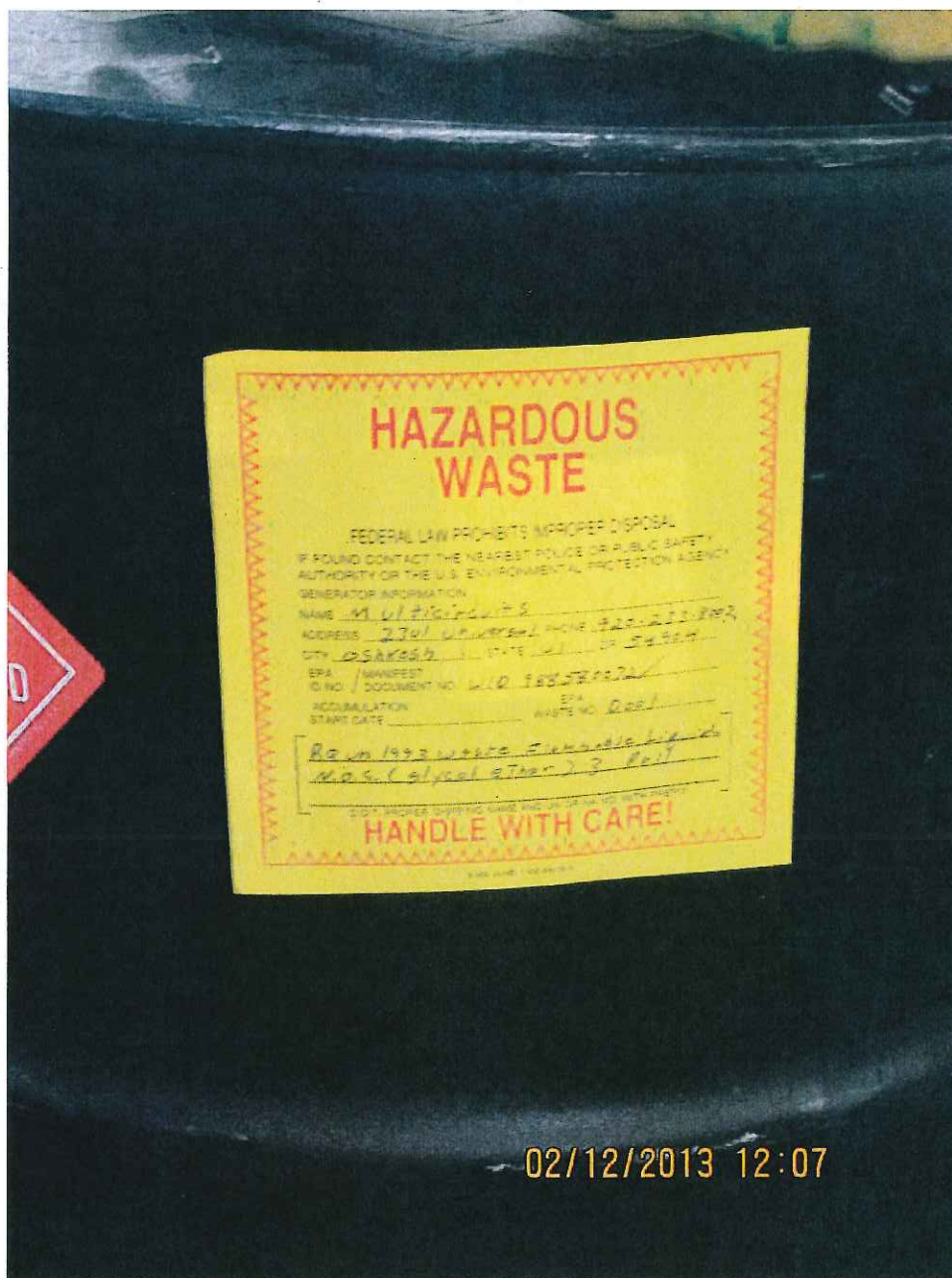
Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open 55 gallon drum containing hazardous waste located at a satellite accumulation identified in Photo#16



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #16

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open 55 gallon drum containing hazardous waste located in a satellite accumulation area

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #17

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open 55 gallon drum containing hazardous waste located at a satellite accumulation area identified in Photo#16



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #18

Name of Photographer: Cindy Dabner

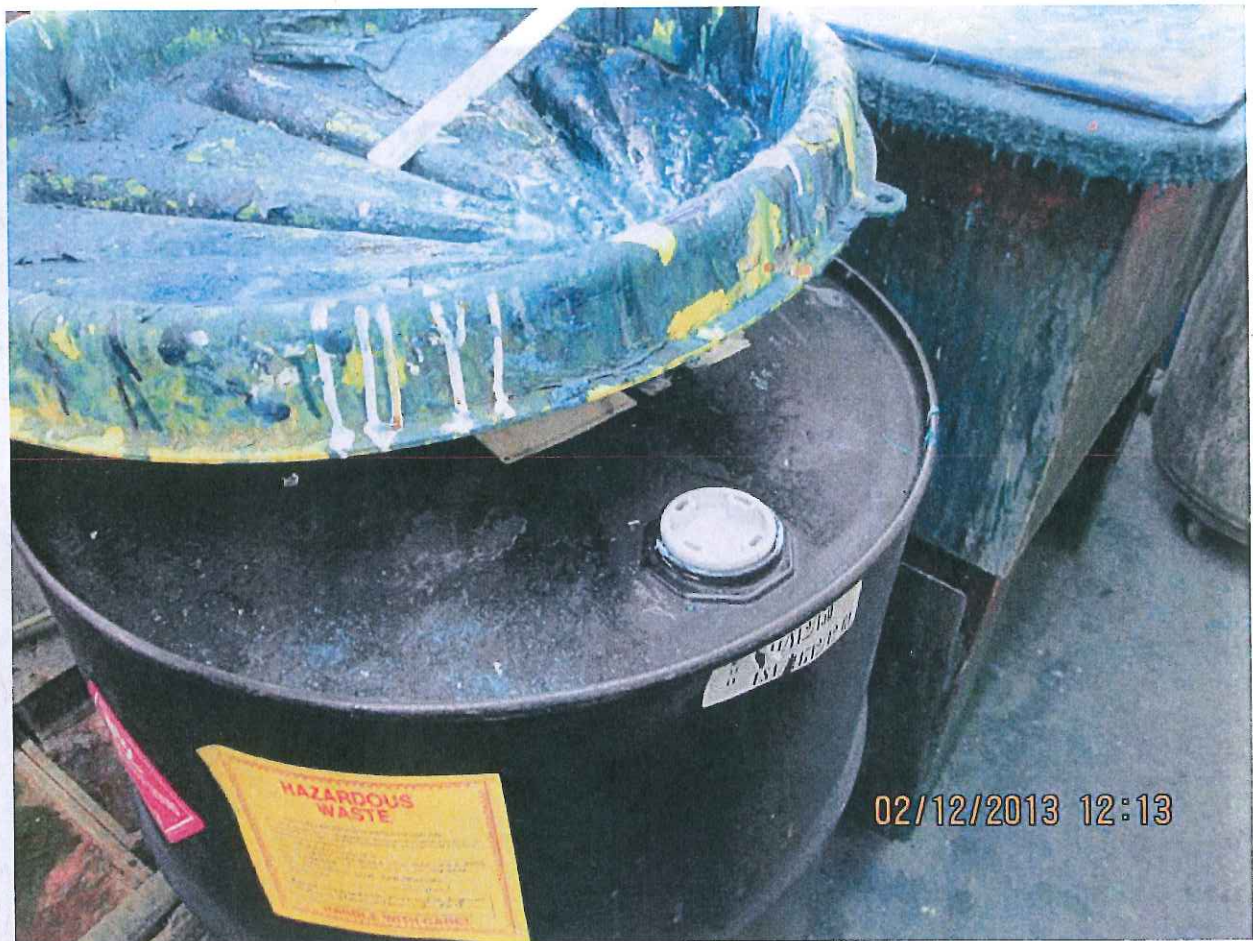
Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open 55 gallon drum containing hazardous waste located in a satellite accumulation area identified in Photo#17



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #19

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Open 55 gallon drum container hazardous waste located at a satellite accumulation area identified in Photo#18

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #20

Name of Photographer: Cindy Dabner

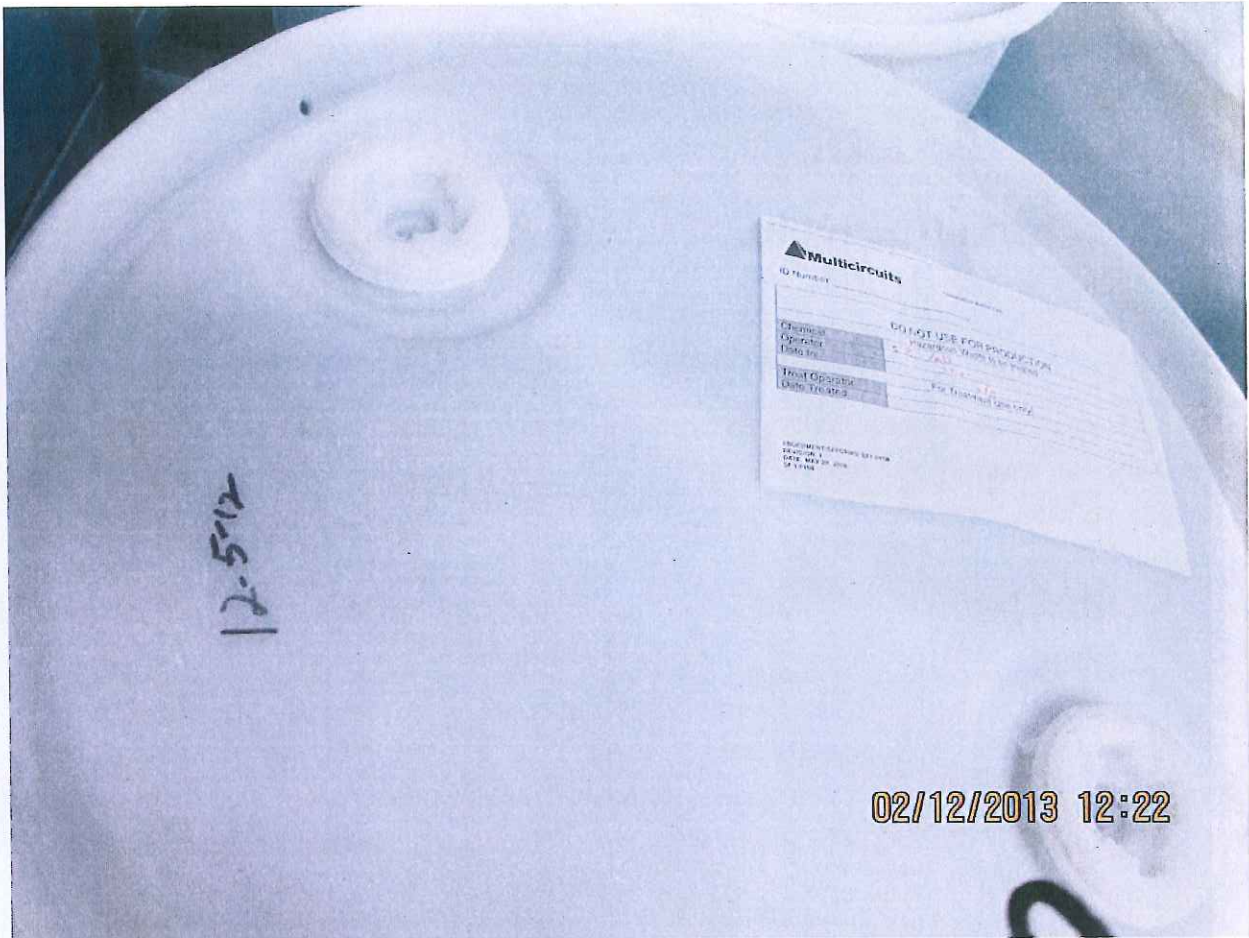
Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Four plastic 55 gallon drums located in the 90 day accumulation storage area



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: 21#

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Top of the plastic 55 gallon drum; drum marked with two dates

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**

**Multicircuits** HAZARDOUS WASTE TAG

ID Number: \_\_\_\_\_

DO NOT USE FOR PRODUCTION Hazardous Waste to be treated	
Chemical	580 1.0168
Operator	22.01
Date In:	2/9
Treat Operator	
Date Treated:	

For Treatment Use only!

DOCUMENTS/FORMS/ SF1.0168  
REVISION: 1  
DATE: MAY 27, 2008  
SF 1.0168

02/12/2013 12:22

Photograph: #22

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A closer picture of the plastic 55 gallon drum labeled with two dates identified in Photo#21



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**

**Multicircuits** HAZARDOUS WASTE TAG

ID Number: \_\_\_\_\_

**DO NOT USE FOR PRODUCTION**  
Hazardous Waste to be treated

Chemical	580-1610
Operator	2/25
Date In:	2/8
Treat Operator	
Date Treated:	

For Treatment Use only!

DOCUMENTS/FORMS/SF1.0168  
REVISION: 1  
DATE: MAY 27, 2008  
SF 1.0168

**02/12/2013 12:22**

Photograph: 23#

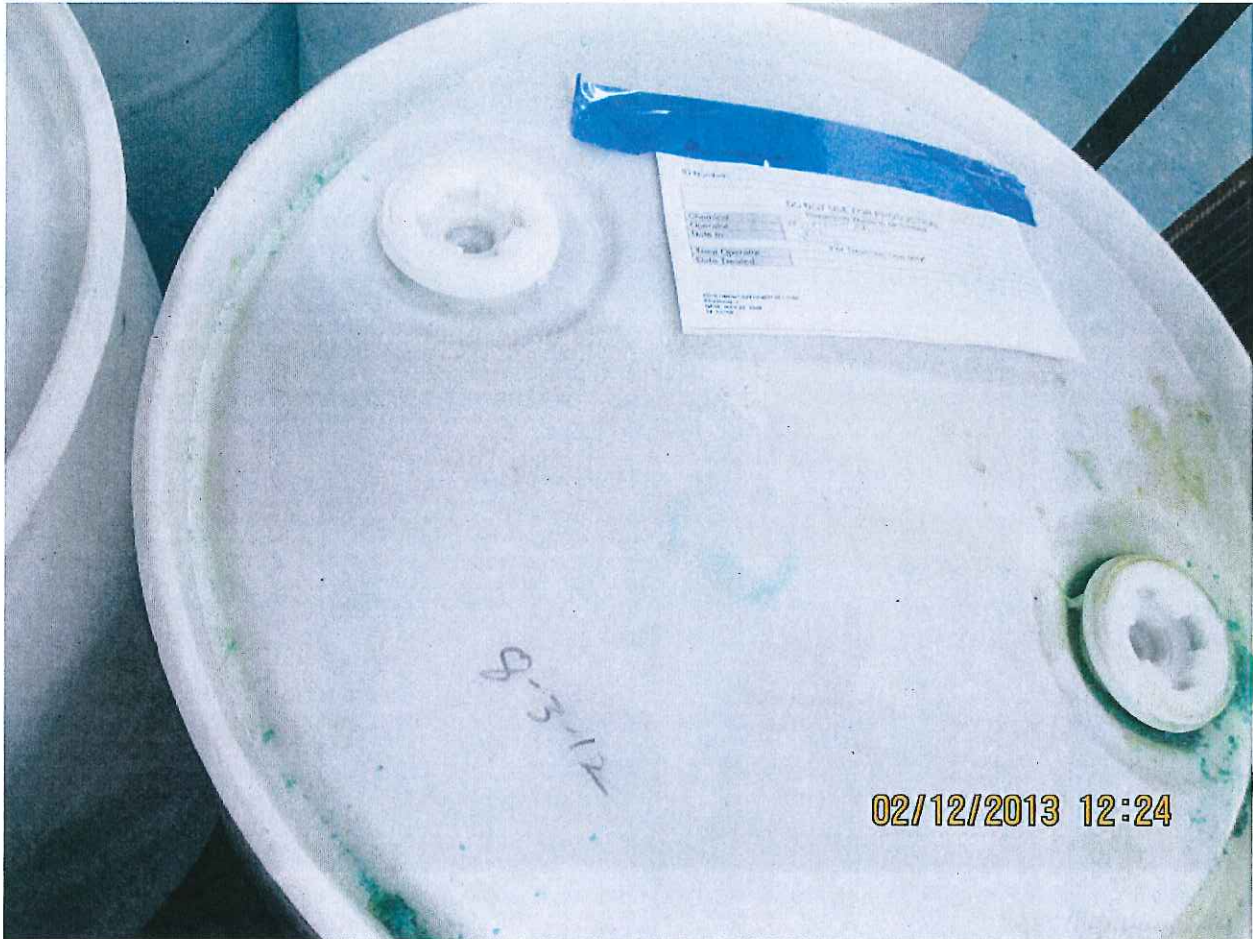
Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A closer picture of the plastic 55 gallon drum labeled with two dates identified in Photo#22

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #24

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A plastic 55 gallon drum marked with two dates located at the 90 day storage area



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**

ID Number: \_\_\_\_\_

**DO NOT USE FOR PRODUCTION**  
Hazardous Waste to be treated

Chemical	MULTICIRCUIT PAINT
Operator	BTZ
Date In:	2-11-13
For Treatment Use only!	
Treat Operator	
Date Treated:	

11DOCUMENTSFFORMS/SF1.0168  
REVISION: 1  
DATE: MAY 27, 2008  
SF 1.0168

02/12/2013 12:24

Photograph: #25

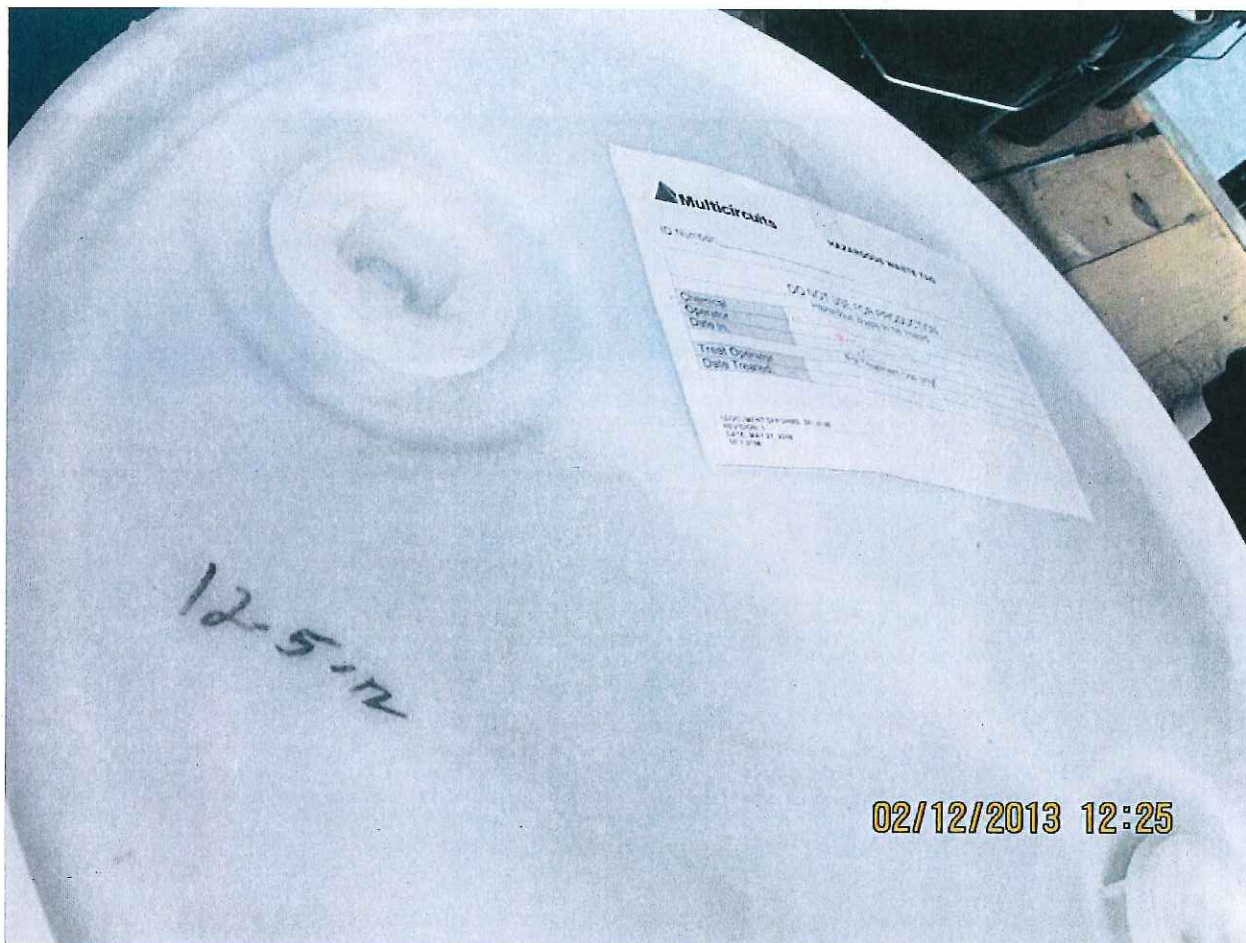
Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A closer picture of the plastic 55 gallon drum labeled with two dates identified in Photo#24

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #26

Name of Photographer: Inspector Cindy Dabner

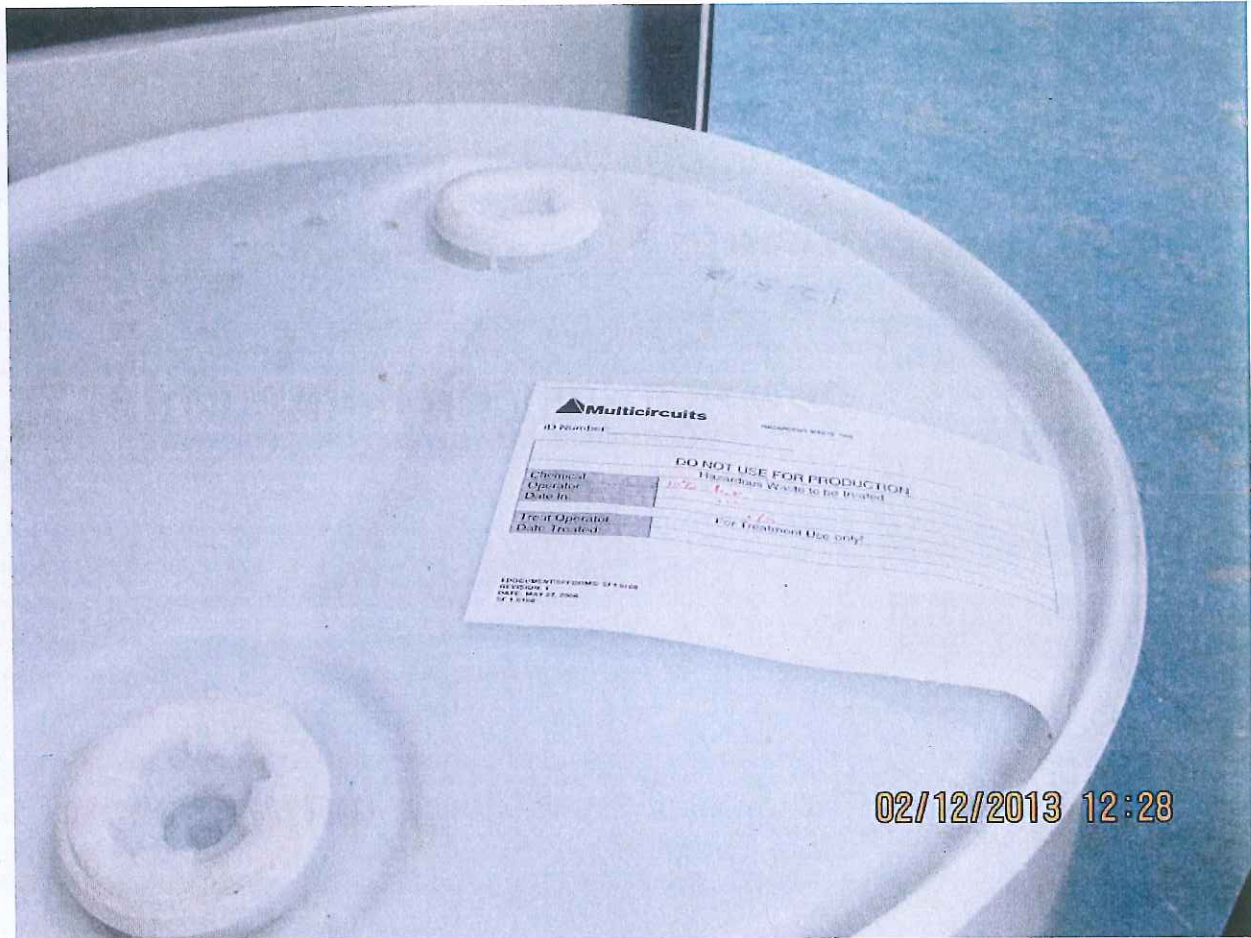
Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A plastic 55 gallon drum marked with two dates located in the 90 day storage area



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #27

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A plastic 55 gallon drum marked with two dates located in the 90 day storage area



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**

**Multicircuits** HAZARDOUS WASTE TAG

D Number: \_\_\_\_\_

**DO NOT USE FOR PRODUCTION**  
Hazardous Waste to be treated

Chemical Operator In: \_\_\_\_\_

Operator Treated: \_\_\_\_\_

10% A-20  
11-01

For Treatment Use only!

02/12/2013 12:28

FORMS/ 571 2168  
ET, 2008

Photograph: #28  
Name of Photographer: Cindy Dabner  
Date/Time of Photograph: February 12, 2013  
Site Location: 2301 Universal Street, Oshkosh, WI 54804  
Description: A closer picture of the plastic 55 gallon drum marked with two dates

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #29

Name of Photographer: Cindy Dabner

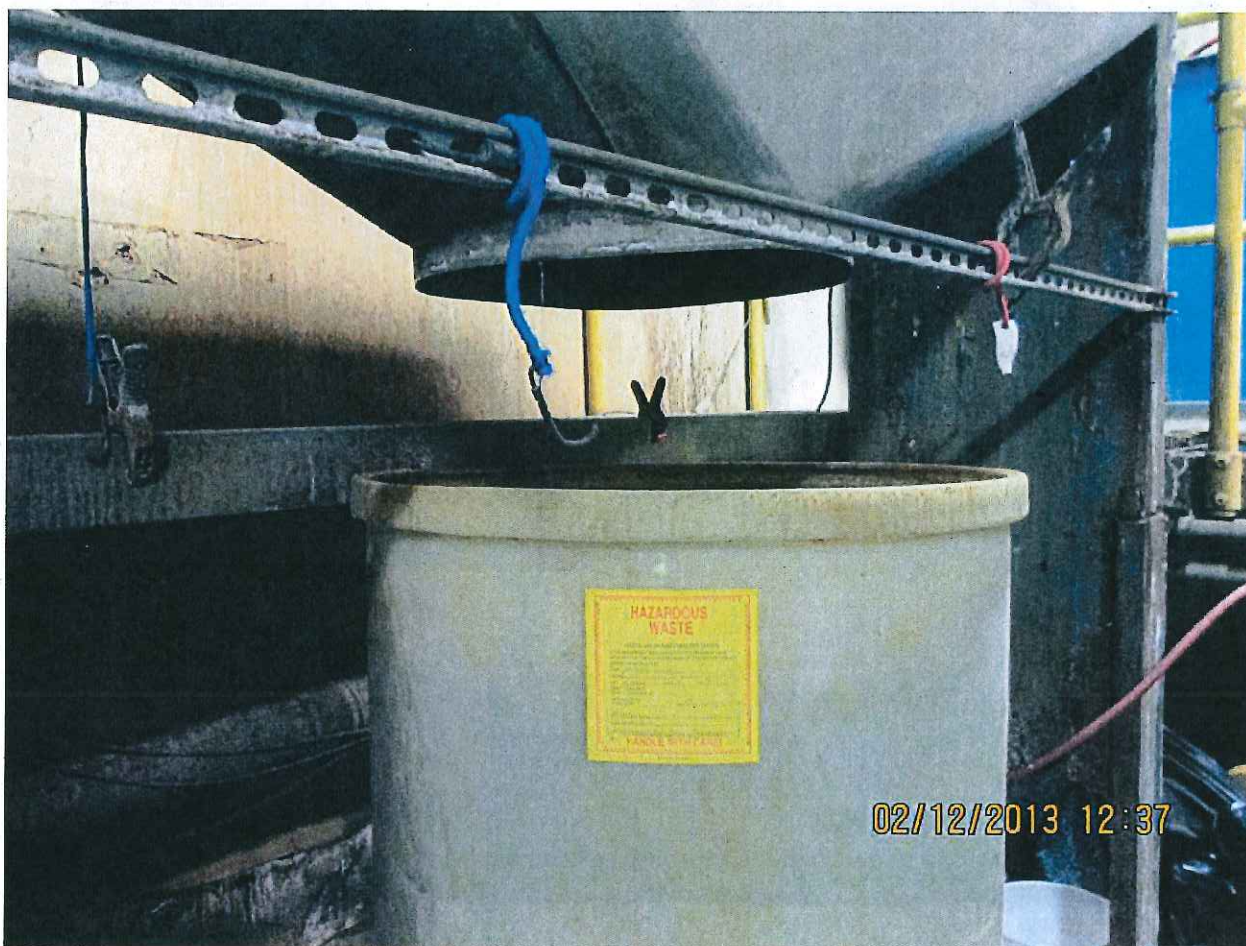
Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Waste water treatment unit with a container marked with hazardous waste label; no hazardous was observed in the contained at the time of the inspection



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #30

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A closer picture of the waste water treatment unit and the container marked with hazardous waste indentified in Photo#29



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**

**HAZARDOUS WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL  
IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:  
NAME MULTICIRCUITS  
ADDRESS 2301 Universal St. PHONE 920-235-8419  
CITY Oshkosh STATE WI ZIP 54804  
EPA / MANIFEST  
ID NO. / DOCUMENT NO. \_\_\_\_\_  
ACCUMULATION  
START DATE \_\_\_\_\_ EPA  
WASTE NO. WID 988 580 072

Res. Hazardous Waste Solid Waste  
Waste No. 1001 (F001)  
Filter Cartridge For Diesel Engines

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX  
**HANDLE WITH CARE!**

02/12/2013 12:37

Photograph: #31

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: A closer picture of the label identified in Photo#30



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #32

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Unmarked 25 gallon container containing organic photo resistant dry-fill chips located in the Wastewater Treatment Unit

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #33

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Container not marked with the specific type of Universal Waste



**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**



Photograph: #34

Name of Photographer: Cindy Dabner

Date/Time of Photograph: February 12, 2013

Site Location: 2301 Universal Street, Oshkosh, WI 54804

Description: Container not marked and labeled with the item of waste

**Attachment A**  
**Photographs for Multicircuits RCRA CEI**  
**WID 988 580 072**  
**February 12, 2013**





**ATTACHMENT B**  
**Multicircuits Photograph Log**  
**WID988580072**

**Attachment B- Multicircuits Photograph Log WID9885980072****Photographer:** US EPA Inspector Cindy Dabner**Location:** Multicircuits 2301 Universal Street, Oshkosh, WI54903**Date(s):** February 12, 2013

<b>Photo #</b>	<b>Description</b>	<b>Date and Time</b>
1	Multicircuits sign	2/12/13 9:32 am
2	5 gallon container located in the Laboratory Area marked as "waste"	2/12/13 11:21 am
3	Two unmarked plastic 55 gallon drums located in the Wet Area of the Electroless Plating Area	2/12/13 11:23 am
4	A picture capturing the top of one of the plastic 55 gallon drums identified in Photo#3	2/12/13 11:23 am
5	Open and unmarked 55 gallon drum containing spent solder dross located in the Electrolyte Tin Processing Area	2/12/13 11:26 am
6	Unmarked 55 gallon drum identified in Photo#5	2/12/13 11:26 am
7	Opened plastic 55 gallon drum containing hazardous waste at the Satellite Accumulation Area	2/12/13 9:32 am
8	Open plastic 55 gallon drum containing hazardous waste identified in Photo#7	2/12/13 11:29 am
9	Opened plastic 55 gallon drum containing hazardous waste located at the Satellite Accumulation Area	2/12/13 11:29 am
10	Open plastic 55 gallon drum located at Satellite Accumulation Area identified in Photo#11	2/12/13 11:48 am
11	Open plastic 55 gallon drum located in a Satellite Accumulation Area	2/12/13 11:48 am
12	Open plastic 55 gallon drum located in a Satellite Accumulation Area identified in Photo#11	2/12/13 11:48 am
13	Open plastic 55 gallon drum located in a Satellite Accumulation Area identified in Photo#11	2/12/13 11:49 am
14	Container marked as material for use/reuse	2/12/13 12:02 pm
15	Open 55 gallon drum containing hazardous waste located at a Satellite Accumulation Area identified in Photo#16	2/12/13 12:07 am
16	Open 55 gallon drum containing hazardous waste located at satellite accumulation are	2/12/13 12:07 pm
17	Open 55 gallon drum containing hazardous waste located at a satellite accumulation area identified in Photo#15	2/12/13 12:07 pm
18	Open 55 gallon drum containing hazardous waste located in a Satellite Accumulation Area identified in Photo#15	2/12/13 12:10 pm
19	Open 55 gallon drum containing hazardous waste located in a Satellite Accumulation Area identified in Photo#15	2/12/13 12:13 pm

Photo #	Description	Date and Time
20	Four plastic 55 gallon drums located in the 90 day Accumulation Storage Area	2/12/13 12:21 pm
21	Top of the plastic 55 gallon drum; drum marked with two dates	2/12/13 12:22 am
22	A closer picture of the plastic 55 gallon drum labeled with two dates identified in Photo#20	2/12/13 12:22 pm
23	A closer picture of the plastic 55 gallon drum labeled with two dates identified in Photo#22	2/12/13 12:22 pm
24	A plastic 55 gallon drum marked with two dates located at the 90 Day Accumulation Storage Area	2/12/13 12:24 pm
25	A closer picture of the plastic 55 gallon drum labeled with two dates identified in Photo#24	2/12/13 12:24 pm
26	A picture of the plastic 55 gallon drum labeled with two dates identified in Photo#24	2/12/13 12:25 pm
27	A picture of the plastic 55 gallon drum labeled with two dates	2/12/13 12:28 pm
28	A closer picture of the plastic 55 gallon drum labeled with two dates identified in Photo#26	2/12/13 12:37 pm
29	Wastewater Treatment Unit with a container marked with a hazardous waste label; no hazardous waste was observed inside the container	2/12/13 12:37 pm
30	A closer picture of the Wastewater Treatment Unit identified in Photo#28	2/12/13 12:41 pm
31	A closer picture of the label identified in Photo#29	2/12/13 12:41 pm
32	Unmarked 25 gallon container containing organic photo resistant dry fill chips located in the Wastewater Treatment Area	2/12/13 12:13 pm
33	Universal Waste not marked with the specific type of waste	2/12/13 14:41 pm
34	Batteries not marked as "Universal Waste"	2/12/13 14:42 pm



# ATTACHMENT C

WDNR Large Quantity Generator Inspection Checklist

Multicircuits WID988580072

## LARGE QUANTITY GENERATOR INSPECTION



Revision: 03/19/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

This inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

### Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	N	662.011
		Photo <input type="checkbox"/>
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.		662.011(3)
		Photo <input type="checkbox"/>
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.		662.011(3)(a)1
		Photo <input type="checkbox"/>
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	N	662.040(3)
		Photo <input type="checkbox"/>
E. Generator submitted a notification form and obtained an EPA ID#.	Y	662.012
		Photo <input type="checkbox"/>
Note: A subsequent notification should be submitted when there is an ownership or name change.		

### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.		662.020(1)
		Photo <input type="checkbox"/>
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	N	662.020(1)
		Photo <input type="checkbox"/>
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2)
		Photo <input type="checkbox"/>
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	N	662.023(3)
		Photo <input type="checkbox"/>
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	NA	662.020(1)
		Photo <input type="checkbox"/>
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	NA	662.034(13)
		Photo <input type="checkbox"/>
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13)
		Photo <input type="checkbox"/>
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1)
		Photo <input type="checkbox"/>
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1)
		Photo <input type="checkbox"/>
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030
		Photo <input type="checkbox"/>



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	<input checked="" type="checkbox"/>	662.031 Photo <input type="checkbox"/>
L. Hazardous waste is marked according to applicable DOT requirements before transport.	<input checked="" type="checkbox"/>	662.032(1) Photo <input type="checkbox"/>
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	<input checked="" type="checkbox"/>	662.032(2) Photo <input type="checkbox"/>
N. Placards are offered to the initial transporter.	<input checked="" type="checkbox"/>	662.033 Photo <input type="checkbox"/>

### Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
B. Generator complies with the prohibition against dilution of wastes.	<input checked="" type="checkbox"/>	668.03 Photo <input type="checkbox"/>
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	<input checked="" type="checkbox"/>	668.07(1) Photo <input type="checkbox"/>
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	<input checked="" type="checkbox"/>	668.07(1)(h) Photo <input type="checkbox"/>
H. Underlying hazardous constituents have been identified for characteristic wastes.	<input checked="" type="checkbox"/>	668.09(1) Photo <input type="checkbox"/>
I. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	<input checked="" type="checkbox"/>	668.09(2) Photo <input type="checkbox"/>
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	<input checked="" type="checkbox"/>	662.034(1)(d) Photo <input type="checkbox"/>





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WASTE & MATERIALS  
MANAGEMENT PROGRAM

## LARGE QUANTITY GENERATOR INSPECTION

### Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041	Photo <input type="checkbox"/>
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	NA	662.042(1)	Photo <input type="checkbox"/>
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NA	662.042(2)	Photo <input type="checkbox"/>
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2)	Photo <input type="checkbox"/>

### Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d)	Photo <input type="checkbox"/>
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d)	Photo <input type="checkbox"/>
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d)	Photo <input type="checkbox"/>
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d)	Photo <input type="checkbox"/>
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d)	Photo <input type="checkbox"/>

### Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d)	Photo <input type="checkbox"/>
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### Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)).	X	662.034(1)(d) Photo <input type="checkbox"/>
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	NA	662.034(1)(d) Photo <input type="checkbox"/>
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	N	662.034(1)(d) Photo <input type="checkbox"/>
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	N	662.034(1)(d) Photo <input type="checkbox"/>
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d) Photo <input type="checkbox"/>



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### Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d) Photo <input type="checkbox"/>
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	X	662.034(1)(d) Photo <input type="checkbox"/>
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d) Photo <input type="checkbox"/>
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d) Photo <input type="checkbox"/>

### Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	Photo <input type="checkbox"/>
B. Accumulation start date is clearly marked and visible for inspection on each container.	N	662.034(1)(b) Photo <input type="checkbox"/>
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c) Photo <input type="checkbox"/>





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### Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(1)(a)1 Photo <input type="checkbox"/>
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	NA	662.034(1)(a)1 Photo <input type="checkbox"/>
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	NA	662.034(1)(a)1 Photo <input type="checkbox"/>
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	NA	662.034(1)(a)1 Photo <input type="checkbox"/>
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	NA	662.034(1)(a)1 Photo <input type="checkbox"/>

### Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration $\geq 10\%$ by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2)). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	NA	 Photo <input type="checkbox"/>
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).	NA	662.034(1)(a) Photo <input type="checkbox"/>
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates $< 300$ hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).	NA	662.034(1)(a) Photo <input type="checkbox"/>
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).	NA	662.034(1)(a) Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply

No 'box' is an open ended question

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### Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)):

1. Analysis determining the design capacity of the hazardous waste management unit.
2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids.
3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.

NA

662.034(1)(a)

Photo ☐

F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)):

1. Information that the production process does not use organic compounds.
2. The process is identical to a process at another facility where the total organic content was measured at <10%.
3. The process has not changed to affect the total organic concentration of the waste.

NA

662.034(1)(a)

Photo ☐

G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).

NA

662.034(1)(a)

Photo ☐

H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.

NA

Photo ☐

### Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1).

1. Between 26 and 119 gallons.
2. Greater than 119 gallons and not in light material service.

NA

Photo ☐

B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)):

1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.
2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.
3. The initial determination is reviewed and updated at least once every 12 months.
4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to  $\geq 500$  ppmw.
5. The average VO concentration is determined by direct measurement or by knowledge.

Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.

NA

Photo ☐

C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).

NA

662.034(1)(a)1

Photo ☐

D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)).

NA

Photo ☐

Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.

E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)):

1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities.
2. Radioactive mixed wastes in accordance with NRC requirements

NA

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### Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2); NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	NA	<input type="checkbox"/> Photo <input type="checkbox"/>
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.	NA	<input type="checkbox"/> Photo <input type="checkbox"/>
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere.  Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	NA	662.034(1)(a)1 <input type="checkbox"/> Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply

No 'box' is an open ended question

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## LARGE QUANTITY GENERATOR INSPECTION

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### Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).

NA

662.034(1)(a)1

Photo ☐

### Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.

NA

Photo ☐

B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a))

1. Container meets applicable US DOT packaging requirements.
2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring.
3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.

NA

662.034(1)(a)2

Photo ☐

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a))

1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve.
2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.

NA

662.034(1)(a)2

Photo ☐

D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))

NA

662.034(1)(a)2

Photo ☐

E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))

NA

662.034(1)(a)2

Photo ☐

F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)

NA

662.034(1)(a)2

Photo ☐

G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.)

1. No additional material will be added within 15 minutes.
2. The person performing the loading operation leaves the immediate vicinity of the container.
3. The process generating the waste shuts down.

NA

662.034(1)(a)2

Photo ☐

H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.)

1. No additional materials will be removed within 15 minutes.
2. The person removing the waste leaves the immediate vicinity of the container.

NA

662.034(1)(a)2

Photo ☐

I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)

NA

662.034(1)(a)2

Photo ☐



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### Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.)

1. Designed to operate with no detectable organic emissions when in the closed position.
2. Closed when the internal pressure is within the specified operating range.
3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.

NA

662.034(1)(a)2

Photo ☐

K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)

NA

662.034(1)(a)2

Photo ☐

L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)

NA

662.034(1)(a)2

Photo ☐

M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)

NA

662.034(1)(a)2

Photo ☐

### Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.

NA

Photo ☐

B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))

NA

662.034(1)(a)2

Photo ☐

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)

NA

662.034(1)(a)2

Photo ☐

D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))

NA

662.034(1)(a)2

Photo ☐

E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))

NA

662.034(1)(a)2

Photo ☐

### Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.

X

Photo ☐

B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.

Y

662.034(3)(a)

Photo ☐

C. Satellite containers are under the control of the operator of the process generating the waste.

Y

662.034(3)(a)

Photo ☐

D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).

Y

662.034(3)(a)1

Photo ☐





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### Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(3)(a)1	Photo <input type="checkbox"/>
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N	662.034(3)(a)1	Photo <input type="checkbox"/>
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.034(3)(a)2	Photo <input type="checkbox"/>
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	NA	662.034(3)(b)	Photo <input type="checkbox"/>
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	NA	662.034(3)(b)	Photo <input type="checkbox"/>

### Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e)	Photo <input type="checkbox"/>
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree.	Y	662.027(1)	Photo <input type="checkbox"/>
Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.			

### Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	NA		Photo <input type="checkbox"/>
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	NA	679.10(2)(a)2	Photo <input type="checkbox"/>
C. Used oil containers and tanks are in good condition and not leaking.	NA	679.22(2)	Photo <input type="checkbox"/>
D. Used oil containers and tanks are marked "used oil".	NA	679.22(3)(a)	Photo <input type="checkbox"/>
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	NA	679.24	Photo <input type="checkbox"/>
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	NA		Photo <input type="checkbox"/>





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### Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:

1. Only used oil from the generator or household do-it-yourselfers is burned.
2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.
3. The combustion gases are vented to the ambient air.

679.23

Photo ☐

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

679.11

Photo ☐

### Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.

N

Photo ☐

B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.

662.034(7)

Photo ☐

C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.

662.034(7)(a)

Photo ☐

D. The F006 waste is legitimately recycled through metals recovery.

662.034(7)(b)

Photo ☐

E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.

662.034(7)(c)

Photo ☐

F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.

662.034(7)(d)1.a

Photo ☐

G. The accumulation start date is clearly marked and visible for inspection on each container.

662.034(7)(d)3

Photo ☐

H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.

662.034(7)(d)1.b

Photo ☐

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".

662.034(7)(d)4

Photo ☐

J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.

662.034(7)(d)1.c

Photo ☐

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.

662.034(7)(d)5

Photo ☐

L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.

662.034(8)

Photo ☐



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## LARGE QUANTITY GENERATOR INSPECTION

### Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.

Y

662.034(1)

Photo ☐

B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).

NA

Photo ☐

C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).

Photo ☐

D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)):

NA

662.034(1)(a)2

Photo ☐

1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment.

2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.





**Attachment F- Multicircuits Post-Inspection Documentation Log WID9885980072**

**Inspection Date: February 12, 2013**

[illegible]

**ATTACHMENT F**  
**Multicircuits Post-Inspection Log**  
**WID988580072**





**Attachment E- Multicircuits Inspection Documentation Log WID9885980072****Inspection Date: February 12, 2013**

<b>Document Description</b>
Material Profile Form PM F006 Filtercake
MSDS Auroelectroless SMT Gold Salt
NPS 3000 Single Step Tin Stripper
Ad 400 Avantage 400 by Micronutrients
Multibond Le Starter
Circuit Board MFG-CN
Visitor Authorization Application (ITAR)
Hazardous Waste Manifest Records for Selected Generator Shipped between 02/01/2010 and 02/01/2013
Industrial wastewater Discharge Permit
Multicircuits Training Documentation
Multicircuits Safety Manual for Hazardous Materials and Emergency Procedures
Multicircuits Off Site Plan
Corrected Manifest
Photo of Flux
Photo of Multibond
Manifest#001548720 GBR
Manifest#001687074 GBF and Land Disposal Restriction Form
Manifest#001687007
Manifest#000318885 and Land Disposal Restriction Form
Manifest#000391148WAS and Land Disposal Restriction Form
Manifest#000413938WAS and Land Disposal Restriction Form
Manifest#000494749WAS
Manifest#000448433WAS and Land Disposal Restriction Form
Manifest#009015047JJK and Certificate of Recycling
Manifest#009015041JJK and Certificate of Recycling
Manifest#006943770JJK and Certificate of Recycling
Manifest#0069943762JJK and Certificate of Recycling
Manifest#0090015050JJK
Manifest#006943768 and Certificate of Recycling
Manifest#005746655JJK and Certificate of Recycling
Manifest#005476401JJK
Manifest#006319235JJK and Land Disposal Restriction Form
Lamp Recyclers Bill of Lading
Additional Requested Information Email May 3, 2013
Gold Cyanide Plating Bath Waste/Material Profile
Silver Filters Waste/Material Profile
Filters Email November 17, 2008
Copper Tin-Strip (Nitric Acid) Waste/Material Profile
Debris from Various Plating Bath Waste/Material Profile
Contingency Plan- Hazardous Spill Emergency Numbers

**ATTACHMENT E**  
**Multicircuits Documentation Log**  
**WID988580072**



## ATTACHMENT D

WNDR Universal Waste Handler Inspection Report-  
Small Quantity Handler Checklist

WID988580072







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# Multicircuits Inc WID 988 (SD) 072

## UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

### Section 1: Prohibitions

A. Universal waste is not disposed on-site.	Y	673.11(1)	Photo <input type="checkbox"/>
B. Universal waste is not diluted or treated on-site.	Y	673.11(2)	Photo <input type="checkbox"/>

Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.

### Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	Y	673.13	Photo <input type="checkbox"/>
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	Y	673.13	Photo <input type="checkbox"/>
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	NA	673.13(1)(b)	Photo <input type="checkbox"/>
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	NA	673.13	Photo <input type="checkbox"/>
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	NA	673.13(3)(b)	Photo <input type="checkbox"/>
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	NA	673.13(2)	Photo <input type="checkbox"/>
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	NA	673.13(2)	Photo <input type="checkbox"/>
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.14	Photo <input type="checkbox"/>
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	NA	673.14	Photo <input type="checkbox"/>
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.15(3)	Photo <input type="checkbox"/>
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.15(1)	Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected  
Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply No 'box' is an open ended question



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## UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

### Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NA	673.15(2)	Photo <input type="checkbox"/>
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16	Photo <input type="checkbox"/>
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	NA	673.17	Photo <input type="checkbox"/>

### Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.18(1)	Photo <input type="checkbox"/>
B. Handler that self-transportes complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	NA	673.18(2)	Photo <input type="checkbox"/>
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	NA	673.18(3)	Photo <input type="checkbox"/>
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.18(4)	Photo <input type="checkbox"/>
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	NA	673.18	Photo <input type="checkbox"/>
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	NA	673.18(7)	Photo <input type="checkbox"/>
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	NA	673.18(8)	Photo <input type="checkbox"/>